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1905 1992

October 31, 1997

VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37201

Re: *Application of Electric Power Board of Chattanooga for
a Certificate of Public Convenience and Necessity to Provide
Intrastate Telecommunications Services*

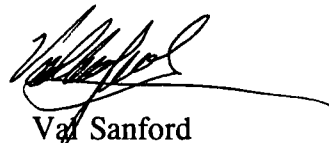
Docket No: 97-01488-07488

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the Petition of AT&T Communications of the South Central States, Inc. for Leave to Intervene in the above matter. I have also enclosed our check in the amount of \$25.00 as filing fee.

Copies are being served on counsel for known parties.

Yours very truly,


Val Sanford

VS/ghc
Enclosure

REC'D TN
REC'D TSN AUTH.
'97 OCT 31 AM 11 20
EXECUTIVE SECRETARY

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

*In Re: Application of Electric Power Board of Chattanooga for a
 Certificate of Public Convenience and Necessity to Provide
 Intrastate Telecommunications Services*

Docket No: 97-01488

**PETITION OF AT&T COMMUNICATIONS OF THE SOUTH
CENTRAL STATES, INC. TO INTERVENE**

REC'D TN
REGULATORY AUTH.
'97 OCT 31 AM 11 20
C. J. S. THE
EXECUTIVE SECRETARY

AT&T Communications of the South Central States, Inc., pursuant to T.C.A. §4-5-310, petitions the Tennessee Regulatory Authority (here "TRA") to grant it leave to intervene in the above-captioned proceeding and to participate as its interests may appear; and for grounds states that:

1. AT&T Communications of the South Central States, Inc. (here "AT&T"), is a Delaware corporation duly qualified to do business in Tennessee, holding Certificates of Public Convenience and Necessity authorizing it to provide interLATA, interexchange telecommunications services and to operate as a competing telecommunications service provider in intrastate commerce in the State of Tennessee.

2. AT&T's legal rights, duties, privileges, immunities or other legal interests may be affected or determined by the outcome of this proceeding.

3. Chapter 531 of the Public Acts of 1997 authorizes municipal electric plants to provide telecommunications services, subject to regulation by the TRA in the same manner and to the same extent as other certificated providers of telecommunications services. Under that statute, there are certain limitations and restrictions imposed on the conduct of telecommunications services by such municipalities. The applicant in this proceeding seeks a

certificate permitting it to provide intrastate telecommunications services in Hamilton and surrounding counties. AT&T has a direct and substantial interest in the furtherance of fair competition in the provision of telecommunications services in Tennessee and in the manner in which this applicant proposes to comply with the competitive safeguards and other requirements set forth in the authorizing statutes.

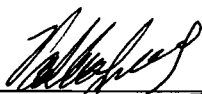
4. AT&T's participation in this proceeding will not impair the interests of justice or the orderly and prompt conduct of the proceeding.

5. AT&T seeks to intervene and participate as its interests may appear.

THE PREMISES CONSIDERED, the Petitioner prays that:

1. An Order be entered allowing AT&T to intervene and participate in this proceeding as its interests may appear and to receive copies of any notices, orders, or other documents that are filed herein; and

2. The Petitioner have such other, further and general relief as the justice of its cause may entitle it to receive.



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Attorneys for Petitioner, AT&T Communications
of the South Central States, Inc.

CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that a copy of the foregoing Petition to Intervene has been served on the following persons at the addresses shown by depositing a copy of the same in the United States mail, postage paid, this 31st day of October, 1997.



Val Sanford

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